

28 Liberty Street, 30th Floor • New York, NY 10005
Telephone: (212) 300-0375 • Facsimile: (212) 481-1333 • www.fslawfirm.com

January 26, 2021

VIA CM/ECF

Hon. John P. Cronan United States District Judge Southern District of New York 500 Pearl Street, Room 1320 New York, New York 10007

Re: Tuy v. Major Cleaning Inc., et al., No. 1:20-cv-05230-JPC

Dear Judge Cronan,

We represent the Plaintiff and opt-in Plaintiff ("Plaintiffs") in the above referenced matter. We, along with counsel for Defendants, hereby submit this joint motion for an extension of time to submit the approval materials for Your Honor's review pursuant to this Court's Individual Rules of Practice.

On December 9, 2020, the Parties informed the Court that they had reached a settlement in principle in this matter. On December 9, 2020, the Court provided the Parties up to January 29, 2021 to submit the proposed settlement agreement and motion for approval. ECF No. 23. Since this time, the corporate Defendant's bankruptcy matter has been dismissed, and Plaintiffs' Counsel has provided a proposed settlement agreement for Defendants' review.

The Parties respectfully request 14 additional days to finalize the settlement agreement, obtain signatures, and submit the motion for approval. This additional time is necessary to accommodate a serious medical issue in Defense Counsel's immediate family. This is the first request for an extension of time for this deadline and it is not done for any delay.

We thank the Court for its time and consideration in advance.

The parties' joint request is GRANTED. The parties shall submit any proposed settlement agreement that requires Court approval by February 12, 2021.

SO ORDERED.

Date: January 26, 2021 JOHN P. CRONAN
New York, New York
United States District Judge

CC: All counsel of record (via CM/ECF)

Sincerely,

Armando A. Ortiz